

To: Lombardi, Marc[Marc.Lombardi@amecfw.com]
Cc: Brown, Anthony R (RM)[anthony.brown@bp.com]; Riley, Gary[riley.gary@epa.gov];
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Joshua[Wirtschafter.Joshua@epa.gov]; Shaffer, Caleb[Shaffer.Caleb@epa.gov]
From: Deschambault, Lynda
Sent: Wed 11/9/2016 11:40:52 PM
Subject: RE: Leviathan Mine - Response to U.S. EPA and LRWQCB Comments on the draft
Groundwater Technical Data Summary Report dated March 21, 2016

Dear Mr. Brown:

Marc thanks for the update and the comments. I am excited that we are doing great work, have so much data, and now discussing the best ways to deliver and review that data! I look forward to discussion of this item and the submissions that will produce the final RI/FS!

As you know, the media specific Technical Data Summary Reports (TDSRs) are not intended to be a process and deliverable of their own. Rather the intent is that these documents are streamlined media specific summaries prepared for incorporation as appendices to the draft and final RIFS report. Fitting these documents in to the RIFS schedule should accelerate the schedule for completion and not hinder it.

EPA is currently completing our review of the Leviathan Mine Superfund Site Schedule. Specifically EPA is reviewing Atlantic Richfield Company's (ARC) June 3, 2016 Remedial Investigation/Feasibility Study Schedule Update, September 9, 2016 Reporting Options for Upcoming Interim RI Submittals; and the March 13, 2015 and December 4, 2015 RIFS Table of Contents (TOC) and Response to EPA comments; Leviathan Mine Site, Alpine County, California.

We will address this comment therein and look forward to discussing an agreed upon schedule for completing a complete RI/FS report.

Lynda

From: Lombardi, Marc [mailto:Marc.Lombardi@amecfw.com]
Sent: Monday, November 07, 2016 5:26 PM
To: Deschambault, Lynda <Deschambault.Lynda@epa.gov>
Cc: Brown, Anthony R (RM) <anthony.brown@bp.com>; Riley, Gary <riley.gary@epa.gov>; DCarey@waterboards.ca.gov; Cohen, Adam <Adam.Cohen@dgslaw.com>; 'sriese' <sriese@ensci-inc.com>; Grant Ohland - (gohland@ohlandhydrogeo.com) <gohland@ohlandhydrogeo.com>; Cory Koger <Cory.S.Koger@usace.army.mil>; Greg Reller <gr@burlesonconsulting.com>; Jefferson, Jill <Jill.Jefferson@amecfw.com>; Parrish, Kent <Kent.Parrish@amecfw.com>
Subject: RE: Leviathan Mine - Response to U.S. EPA and LRWQCB Comments on the draft Groundwater Technical Data Summary Report dated March 21, 2016

Lynda,

As indicated in the Three-Week Field Schedule Projection provided to U.S. EPA on October 28, 2016, the last groundwater samples to be collected during the 2016 field season will be collected this week, not September 29 as suggested in your email below.

Depending on the size of the dataset, the time required to complete laboratory analyses, receive laboratory analytical results, complete data validation, prepare the quality control summary report, and complete the data quality assessment worksheet is at least 120 to 180 days. While 120 days might be adequate to complete the data quality assessment process for smaller, less complex datasets that can be evaluated independently, 120 days does not provide adequate time for data interpretation, report preparation, and report review, especially for a larger dataset or a dataset that impacts more than one Technical Data Summary Report (TDSR). Atlantic Richfield has submitted samples for nearly 3,000 laboratory analyses during the 2016 field season. The size, complexity, and number of datasets that need to be evaluated concurrently will require considerably more than 120 days for processing and reporting.

As indicated in the reporting schedule provided on June 3, 2016, Atlantic Richfield is planning to provide a full Groundwater TDSR that includes the 2016 data in third quarter 2017. It is premature to provide a date certain for that report. We look forward to further discussing the reporting schedule and sequencing with you during the meeting on

December 13.

Should you have any questions or comments, please contact Tony Brown at (714) 228-6770 or anthony.brown@bp.com.

Thanks,

Marc

Marc R. Lombardi, CEM, PG

Principal Geologist / Office Manager, Environment & Infrastructure Americas, Amec Foster Wheeler

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From: Deschambault, Lynda [<mailto:Deschambault.Lynda@epa.gov>]

Sent: Monday, November 07, 2016 7:13 AM

To: Lombardi, Marc <Marc.Lombardi@amecfw.com>

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Subject: RE: Leviathan Mine - Response to U.S. EPA and LRWQCB Comments on the draft Groundwater Technical Data Summary Report dated March 21, 2016

Thanks Marc!

EPA initially proposed that ARC provide a revised Groundwater report by December 31st. ARC is proposing January 25, 2016. ARC suggests that the report won't include the 2016 data.

As discussed in our technical meeting and in recent written comments, EPA feels 120 days from data of last sampling is reasonable. EPA is completing our review of the RIFS Schedule and Reporting Memo, and will provide comments under separate cover.

Given the last groundwater data was collected September 29, 2016; that would be the end of January.

Please provide a date certain, when EPA can expect a full GW data reporting, including the sample results from the new monitoring wells that were installed during this 2016 field season?

Lynda

From: Lombardi, Marc [<mailto:Marc.Lombardi@amecfw.com>]

Sent: Friday, November 04, 2016 5:37 PM

To: Deschambault, Lynda <Deschambault.Lynda@epa.gov>

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Stelman, Ken <ken.stelman@amec.com>

Subject: Leviathan Mine - Response to U.S. EPA and LRWQCB Comments on the draft
Groundwater Technical Data Summary Report dated March 21, 2016

Lynda,

On behalf of Atlantic Richfield, Amec Foster Wheeler is submitting the attached responses to comments provided by the U.S. Environmental Protection Agency and the Lahontan Regional Water Quality Control Board on the draft Groundwater Technical Data Summary Report dated March 21, 2016, for the Leviathan Mine Site, Alpine County, California. Hardcopy to follow.

Should you have any questions or comments, please contact Tony Brown at (714) 228-6770 or anthony.brown@bp.com.

Thanks,

Marc

Marc R. Lombardi, CEM, PG

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